

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

IN RE: §
§ **CASE NO. _____**
LAND TEJAS SPRING TRAILS, LTD. §

ORIGINAL JOINT CREDITOR'S PETITION FOR ORDER OF RELIEF
(CHAPTER 7)

TO AN HONORABLE UNITED STATES BANKRUPTCY JUDGE:

Houston Landscape, Stubbs Construction, and Park Construction Associates, L.L.C. petitioning creditors, (~~%Petitioners+~~) in support of their involuntary petition to commence a Chapter 7 bankruptcy case against LAND TEJAS SPRING TRAILS, LTD. (~~%Debtor+~~), pursuant to 11 U.S.C. § 303, allege as follows:

PARTIES

1. Houston Landscape is an entity doing business in Harris County, Texas. Houston Landscape is an unsecured creditor of Debtor.
2. Stubbs Construction is an entity doing business in Harris County, Texas. Stubbs Construction is an unsecured creditor of Debtor.
3. Park Construction Associates, L.L.C. is an unsecured creditor of Debtor.
4. Debtor, LAND TEJAS SPRING TRAILS, LTD. is a limited partnership principal place of business located at 2450 Fondren, Suite 210, Houston, Texas 77063. The general partner of the Debtor is Land Tejas Companies, Attention: Courtney P. Grover, III.

BASIS FOR INVOLUNTARY PETITION

5. At this time Debtor owes Petitioner Houston Landscape approximately \$14,815.59.
6. At this time Debtor owes Petitioner Stubbs Construction approximately \$25,521.00.

7. At this time Debtor owes Petitioner Park Construction Associates, L.L.C. approximately \$12,491.55.

8. The claims of Petitioners Houston Landscape, Stubbs Construction, and Park Construction Associates, L.L.C. are not contingent as to liability and not subject to any bona fide dispute.

9. Debtor's principal place of business has been within this district for the 180 days preceding the filing of this petition.

10. Debtor is an entity against whom an Order for Relief may be entered under Title 11, United States Code.

11. Petitioners are eligible to file this petition pursuant to 11 U.S.C. §303. This Court has jurisdiction over this matter pursuant to 28 U.S.C. §1334 and 11 U.S.C. §303(a) and (b)(2) and Bankruptcy Rule 1003. Venue is proper as the Debtor's principal place of business has been Houston, Texas for the 180 days preceding the filing of this petition.

12. The amounts owed by Debtor to Petitioners are past due and Debtor has failed to pay the debts owed to the respective Petitioners and other creditors as such debts have become due.

RELIEF REQUESTED

WHEREFORE, Petitioners Houston Landscape, Stubbs Construction, and Park Construction Associates, L.L.C. request that the Court grant the following relief:

A. Enter an Order of Relief against the Debtor, LAND TEJAS SPRING TRAILS, LTD.; and

B. To grant such other relief as is just and equitable.

Respectfully submitted,

/s/ David Paz

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